

5

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 YIFEI CHU,
aka "Philip Chu"

Defendant.

Case: 2:23-cr-20011
Judge: Roberts, Victoria A.
MJ: Grand, David R.
Filed: 01-05-2023
INDI USA VS CHU (DP)

VIO: 18 U.S.C. §1001
18 U.S.C. §1519

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(Making a False Statement, 18 U.S.C. § 1001)

D-1 YIFEI CHU

On or about August 11, 2021, in the Eastern District of Michigan, Southern Division, the defendant, YIFEI CHU, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by answering "No" on his government form SF-86 in response to the question –

Have you in the last seven (7) years provided advice or support to any individual associated with a foreign business or other foreign organization that you have not previously listed as a former employer?

That statement and representation was false because, as YIFEI CHU then and there knew, while he was still working for the United States Government, he provided consultation services to the Taiwanese Navy on at least three occasions during the period 2016-18; all in violation of Title 18, United States Code, Section 1001.

COUNT TWO

(Falsification of Records in a Federal Investigation, 18 U.S.C. § 1519)

D-1 YIFEI CHU

On or about January 26, 2022, in the Eastern District of Michigan, Southern Division, and elsewhere, the defendant, YIFEI CHU, knowingly made a false entry in a record and document with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of the United States Department of Justice, the United States Department of Defense, and the United States Department of Commerce, and in relation to and in contemplation of such matter. Specifically, defendant YIFEI CHU, provided false information in his affidavit, as part of his completion of his SF-86 questionnaire pertaining to his

federal background investigation regarding his security clearance, when he represented that -

I have never been invited to be a guest lecturer by any foreign entity. I have never been approached by anyone asking me to work for a foreign entity. I have never represented a foreign interest. No one has ever asked me to provide information, regardless of whether or not officially classified, to a foreign entity/government.

I have never had contact with anyone representing a non-U.S. intelligence/security service to include personal meetings, written correspondence, telephonic contact, e-mails, or any other form of communication. Since serving in the Taiwanese military, I have never had contact with anyone representing foreign military to include personal meetings, written correspondence, telephonic contact, e-mails, or any other forms of communication.

I have never been contacted by, and am not in contact with any person known or suspected of being involved or associated with foreign intelligence, terrorist, security, or military organizations.

I have never had any affiliation with a foreign government, military, security, defense industry, or intelligence service other than [mandatory military service years earlier].

The representations were false because, as YIFEI CHU then and there knew in 2017, while he was still working for the United States Government, he travelled to Kaohsiung, Taiwan, to provide a lecture on the implementation of modeling systems in naval operations on a Taiwanese naval base on or about December 18, 2017; all

in violation of Title 18, United States Code, Section 1519.

THIS IS A TRUE BILL

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney


s/Michael C. Martin
MICHAEL C. MARTIN
Chief, National Security Unit
Assistant United States Attorney

s/Ronald W. Waterstreet
RONALD W. WATERSTREET
Assistant United States Attorney

Dated: January 5, 2023

ORIGINAL**(Companion Case information MUST be completed by AUSA and initialed.)**United States District Court
Eastern District of Michigan**Criminal Case Cover Sheet****Case Number**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: 

Case Title: USA v. Yifei Chu, aka "Philip Chu"**County where offense occurred :** Washtenaw**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty** Indictment/ Information — no prior complaint. ✓ Indictment/ Information — based upon prior complaint [Case number: 22-mj-30460 Indictment/ Information — based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information****Superseding to Case No:** _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (If applicable)****Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**January 5, 2023

Date


 Ronald Waterstreet
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: (313) 226-9593

E-Mail address: Ronald.Waterstreet@usdoj.gov

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.